

# **Small Business Regulatory Fairness Board**

## **Small Business Impact Statement**

**Date:** May 4, 2016

**Rule Number:** 19 CSR 30-40.800

**Name of Agency Preparing Statement:** Department of Health and Senior Services

**Name of Person Preparing Statement:** Les Jobe

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**Name of Person Approving Statement:**

**Please describe the methods your agency considered or used to reduce the impact on small businesses** (*examples: consolidation, simplification, differing compliance, differing reporting requirements, less stringent deadlines, performance rather than design standards, exemption, or any other mitigating technique*). This proposed rule 19 CSR 30-40.800 provides an opportunity for EMT-Paramedics to get an additional certification in the area of community paramedicine. This proposed rule has no requirement for small businesses (ambulance district and training entities) to participate in training EMT-Community Paramedics or in hiring EMT-Community Paramedics. Only small business training entities and ambulance districts which choose to participate in community paramedicine must comply with the proposed rule.

**Please explain how your agency has involved small businesses in the development of the proposed rule.** The Department has worked with the State Advisory Council on EMS ("SAC") and different subcommittees within SAC. Members of the SAC and the different subcommittees within SAC include employees of EMT-Paramedic training entities and ambulance districts that would be hiring EMT-Community Paramedics and medical directors of ambulance districts. The Department also asked for several health care organizations to review the proposed rule and the Department worked specifically with the Missouri Nurse's Association and Missouri Alliance for Home Care on language of the proposed rule.

**Please list the probable monetary costs and benefits to your agency and any other agencies affected. Please include the estimated total amount your agency expects to collect from additionally imposed fees and how the moneys will be used.** There will be no monetary benefits to the Department.

The Department will not receive any fees from small businesses related to this proposed rule amendment. The probable costs to the Department in processing EMT-Community Paramedic applications and conducting investigations is estimated to be \$43,897.50 for the first five year period and \$6893.22 annually thereafter.

**Please describe small businesses that will be required to comply with the proposed rule and how they may be adversely affected.** Small businesses will not be required to comply with the proposed rule as there are no requirements for small businesses in this proposed rule. However, if small business ambulance districts choose to voluntarily participate, then ambulance districts may have to pay EMT-Paramedics certified as an EMT-Community Paramedics a higher salary for their additional educational training and experience. These ambulance districts may also have to pay their medical director a higher salary in regard to the increased responsibilities of the community paramedic program. If these ambulance districts are working with hospitals to lower readmission rates, then they will likely receive compensation back for their program through the hospitals. Small business training entities that choose to participate in the program will impose a fee on EMT-Community Paramedic students for their training and be able to reimburse themselves for any additional costs for the EMT-Community Paramedic training program.

**Please list direct and indirect costs (in dollars amounts) associated with compliance.**

Please see the private and public fiscal notes filed with this proposed rule for ambulance districts and training entities.

**Please list types of business that will be directly affected by, bear the cost of, or directly benefit from the proposed rule.** Ambulance districts and training entities that choose to participate in community paramedicine will now be able to train and hire EMT-Community Paramedics and the ambulance districts will be able to create a community paramedicine program in their communities to benefit their residents.

**Does the proposed rule include provisions that are more stringent than those mandated by comparable or related federal, state, or county standards?**

Yes\_\_\_ No\_\_X\_\_

**If yes, please explain the reason for imposing a more stringent standard.**

*For further guidance in the completion of this statement, please see §536.300, RSMo.*